

EXHIBIT 4

(To Be Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CLAUDINNE FELICIANO,)
Individually and on behalf of)
all others similarly situated,)
Plaintiff,)
-against-) Case No. 17-CV-05507 (AKH)
CORELOGIC SAFERENT, LLC)
a/k/a CORELOGIC RENTAL PROPERTY)
SOLUTIONS, LLC,)
Defendant.)

VIDEOTAPED ORAL DEPOSITION OF
NAEEM KAYANI
DECEMBER 6, 2018

VIDEOTAPED ORAL DEPOSITION OF NAEEM KAYANI, produced as a
witness at the instance of the Plaintiffs, and duly sworn, was
taken in the above-styled and numbered cause on the 6th day of
December, 2018, from 10:02 a.m. to 4:02 p.m., before June Pate,
CSR in and for the State of Texas, reported by machine shorthand,
at Veritext - Dallas, Texas, 600 North Pearl Street, Suite 2230,
Dallas, Texas, pursuant to the Federal Rules of Civil Procedure
and any provisions stated on the record.

1 clients' property management softwares that may display this
2 information on their software. So these three -- the same points
3 as an industry standard is what the screening companies use and
4 what property management companies expect.

5 Q. Okay. Going back to the types of information that can
6 appear in a report, is it fair to say that these particular types
7 of information come from a variety of different sources and
8 databases?

9 A. Correct.

10 [REDACTED]
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19 [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED]

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25 [REDACTED]

1 Q. So that would be referring to a person at the property
2 end of this as opposed to the RPS end of it; is that right?

3 A. That is correct.

4 Q. And the next line is Performed on. What is that
5 referring to?

6 A. The date that the report was requested and the time
7 stamp.

8 Q. And is the report provided -- well, withdrawn.
9 How long after the user enters the required data
10 is the report provided?

11 MR. ST. GEORGE: Object to form.

12 A. In most cases, it's instant, with the exceptions where
13 if there is -- so on the criminal side, if there is data not
14 available and it requires a delayed search, then the report is put
15 on hold, but in most cases, it's instant.

16 Q. (By Mr. Fishman) Okay. So would it be fair to say
17 that it's instant in all cases where there is not a criminal
18 record involved?

19 A. Correct.

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13 REQUESTED INFORMATION: _____
14 _____

15 Q. So now with respect to the score...

16 MR. FISHMAN: Well, I'm going to ask the reporter
17 if you will show the witness from the documents that were sent
18 down today, pages 1 through 4? Can you do that? They are
19 handwritten marked at the bottom of the page.

20 MR. ST. GEORGE: James, in the future, if you're
21 going to show the witness exhibits, I would appreciate a copy,
22 especially ones that are not in the record already. I will just
23 look over his shoulder for now, but --

24 MR. FISHMAN: Yeah. Sorry about that. This was
25 something that came in at the last minute. But you could make a